

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

TODD A. WRIGHT, Individually and On
Behalf of All Others Similarly Situated

Plaintiffs,

vs.

WACHOVIA CORP; et al.,

Defendants.

ECF Case

Case No. 08 Civ. 5324 (DC) (DF)

MOTION TO ADMIT COUNSEL PRO HAC VICE

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, David S. Preminger, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of Derek W. Loeser, Keller Rohrbach, L.L.P., 1201 Third Avenue, Seattle, Washington 98101-3052, (telephone), (206) 623-1900, (fax) (206) 623-3384, dloeser@kellerrohrbach.com.

Derek W. Loeser is a member in good standing of the Bar of the State of Washington. There are no pending disciplinary proceedings against Derek W. Loeser in any State or Federal Court.

Dated: New York, NY
July 11, 2008

Respectfully submitted:
Keller Rohrbach L.L.P.

By: 

David S. Preminger (DP-1057)
275 Madison Avenue, Suite 1425
New York, NY 10016
Telephone: (212) 878-8890
Facsimile: (212) 878-8895
dpreminger@kellerrohrbach.com

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**TODD A. WRIGHT, Individually and On
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ECF Case

Plaintiffs,

Case No. 08 Civ. 5324 (DC) (DF)

VS.

WACHOVIA CORP; et al.,

Defendants.

**DECLARATION OF DAVID S. PREMINGER
IN SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

David S. Preminger declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am a member of the firm of Rosen Preminger & Bloom LLP, co-counsel for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Derek W. Loeser as counsel pro hac vice to represent Plaintiffs in this matter.

2. I am a member in good standing of the bar of the state of New York, and was admitted to practice law on March 12, 1973. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. In June of this year I joined Keller Rohrback L.L.P., the law firm in which Mr. Loeser is a partner. Mr. Loeser is resident in the firm's principal office in Seattle, Washington.

4. I have known Mr. Loeser since May 2, 2008. I am familiar with his practice, reputation and abilities. We have been and are currently frequently involved in ERISA class action litigation representing plaintiffs.

5. I have found Mr. Loeser to be a skilled attorney and a person of integrity. See also accompanying affidavit of Derek W. Loeser to which a certificate of good standing is

attached as Exhibit 1. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Derek W. Loeser, pro hac vice.

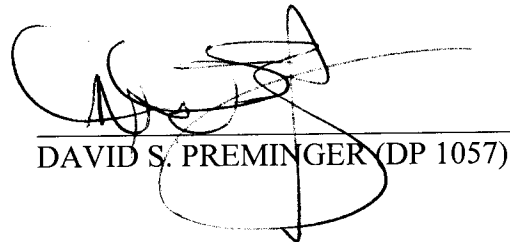
7. I respectfully submit a proposed order granting the admission of Derek W. Loeser, pro hac vice, which is attached as Exhibit 2.

WHEREFORE, it is respectfully requested that the motion to admit Derek W. Loeser, pro hac vice, to represent Plaintiffs in the above captioned matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 11, 2008 in New York, New York

Respectfully submitted,



DAVID S. PREMINGER (DP 1057)

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

TODD A. WRIGHT, Individually and On Behalf
of All Others Similarly Situated

Plaintiff,

vs.

WACHOVIA CORP; JOHN D. BAKER, II;
PETER C. BROWNING; JOHN T. CASTEEN,
III; JEROME A. GITT; WILLIAM H.
GOODWIN, JR.; MARYELLEN C.
HERRINGER; ROBERT A. INGRAM;
DONALD M. JAMES; MACKEY J.
MCDONALD; JOSEPH NEUBAUER;
TIMOTHY D. PROCTOR; ERNEST S. RADY;
VAN L. RICHEY; RUTH G. SHAW; LANTY L.
SMITH; G. KENNEDY THOMPSON; DONA
DAVIS YOUNG; BENJAMIN J. JOLLEY;
SHANNON MCFAYDEN; and JOHN AND
JANE DOES 1-20.

Defendants.

Case No. 08 Civ 5324

AFFIDAVIT OF DEREK W. LOESER

DEREK W. LOESER, an attorney duly admitted to practice in the Courts of this State of Washington, declares, pursuant to the Individual Rules and Procedures of this Court and Rule

1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, as follows:

1. I am a partner with the law firm of Keller Rohrback L.L.P., Counsel for Plaintiffs in the above-captioned matter with David Preminger.

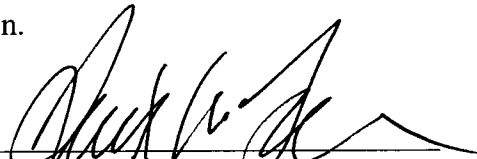
2. I submit this Affidavit in support of Plaintiffs' motion for my admission to practice *pro hac vice* in this matter to argue or try this particular case in whole or in part as counsel or advocate.

3. As shown in the Certificate of Good Standing issued by the Supreme Court of the State of Washington and attached hereto as Exhibit 1, I am a member in good standing of the Bar of the State of Washington.

4. There are no pending disciplinary proceedings against me in any State or Federal court.

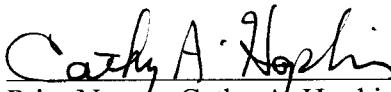
I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 7, 2008, at Seattle, Washington.


DEREK W. LOESER

SUBSCRIBED AND SWORN TO before me this 7th day of July, 2008.




Print Name: Cathy A. Hopkins
NOTARY PUBLIC in and for the State of
Washington; residing at: Lynnwood
My commission expires: 1-7-12

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION)	BAR NO. 24274
)	
OF)	CERTIFICATE OF GOOD
)	
DEREK WILLIAM LOESER)	STANDING
)	
TO PRACTICE IN THE COURTS OF THIS STATE)	
)	

I, Ronald R. Carpenter, Clerk of the Supreme Court of the State of Washington, hereby certify

DEREK WILLIAM LOESER

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on November 15, 1994, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have
hereunto set my hand and affixed
the seal of said Court this 25th day of
June, 2008.

A handwritten signature in black ink, appearing to read "Ronald R. Carpenter", is written over a horizontal line.

Ronald R. Carpenter
Supreme Court Clerk
Washington State Supreme Court

**UNITED STATES DISTRICT COURT
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Behalf of All Others Similarly Situated)	
)	Case No. 08 Civ. 5324 (DC) (DF)
Plaintiffs,)	
vs.)	
)	
WACHOVIA CORP; et al.,)	
)	
Defendants.)	

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of David S. Preminger, co-counsel for Plaintiffs, and said sponsor attorney's declaration in support;

IT IS HEREBY ORDERED that Derek W. Loeser, Keller Rohrback, L.L.P., 1201 Third Avenue, Seattle, Washington 98101-3052, (telephone), (206) 623-1900, (fax) (206) 623-3384, dloeser@kellerrohrback .com, is admitted to practice pro hac vice as counsel for Plaintiffs in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

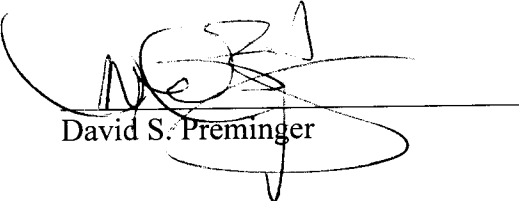
So Ordered: New York, NY
July , 2008

UNITED STATES DISTRICT/MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, a copy of the foregoing Motion to Admit Counsel Pro Hac Vice was served on Myron D. Rumeld, Esq., Proskauer Rose LLP, 1585 Broadway, New York, NY 10036.

July 11, 2008


David S. Preminger